

FIELD WORK AUDIT PROGRAM AND RESULTS FILE

Auditor: M. Krone

Date: 1/31/01

APPROVED:

DATE:

(“G” Represents Fieldwork Audit Objectives for HZMT Inspections)

**HAZARDOUS MATERIALS DIVISION
INSPECTIONS**

OBJECTIVE:

TO ENSURE THAT FACILITIES ARE BEING INSPECTED IN AN EFFECTIVE , EFFICIENT, AND ECONOMICAL MANNER AND IN COMPLIANCE WITH FEDERAL, STATE, AND CITY RULES AND REGULATIONS.

SUB-OBJECTIVE:

Determine if the Hazardous Material Inspections are meeting the Federal, State, and City inspection frequency requirements.

G-1 *Verify controls over the frequency of inspection assignments.*

[*Inspection Requirements*] [T-1, T-4]

G-1-1 Document procedures for determining the inspection frequency and scheduling process. [C-1, C-3, C-4]

G-1-2 Obtain and analyze the current inspection schedule for each facility classification. Compare actual inspection frequency to the required federal, state, and local inspection frequency requirements. [C-1, C-3, C-4]

G-1-3 Obtain information on how many Hazardous Material inspections took place over the last three years.

G-1-4 Analyze the number of inspections to see if they correspond with fire permit groups and fees.

G-1-5 Compare the scheduled to the actual inspections to determine the level of disparity with the planned work activity for the year. [C-4]

G-2 *Summarize sub-objective results:*

Overall assessment and/or conclusion;

Audit issues and/or findings; If information comes to auditor's attention indicating that abuse or illegal acts may have occurred, the Auditor-in Charge will immediately notify the City Auditor and the Supervising Auditor. Audit steps will be extended as

necessary and the auditor should determine the extent to which these acts significantly affect the audit results. (*Audit standards FWS 3A and 3B*).

SUB-OBJECTIVE:

Evaluate the effectiveness and consistency of enforcement actions, and ensure that facilities comply in a timely manner.

G-3 *Verify that Inspectors consistently identify violations and issue appropriate enforcement actions. [Applying appropriate sanctions]* [T-2,T-3, T-6, T-7, T-8]

Document policies and procedures to:

- G-3-1 Determine appropriateness and completeness of management's guidelines and direction. [C-1, C-2, C-5, C-6, C-7]
- G-3-2 Review the San Jose City Fire Code and Charter, State Fire Code, and relevant City of San Jose City policies for code enforcement.
- G-3-3 Determine appropriate steps to resolve, review, and close cases. [C-4, C-5, C-6, C-7]
- G-3-4 Review the Division's procedures for identifying violations and issuing corrective actions. [C-1, C-2, C-3, C-5, C-6, C-7]
- G-3-5 Determine if there is coordinated effort between the Arson's group of reporting on 'what caused the fire' to the latest 'Record of Inspection' in preventing future fires of this nature.

Analyze the database to determine overall BFP's lack of followup:

- G-3-6 Identify the issuance of violations and corrective actions. Identify frequency of the different violations and any variance or inconsistency in enforcement actions taken. [C-1, C-2, C-3, C-5, C-6, C-7]
 - G-3-7 Compare database information to the hard copy files for 25 cases to verify that Inspectors issue enforcement actions according to procedures. Note if similar violations are treated differently.
- G-4** *Evaluate the effectiveness of the inspection program in ensuring that facilities implement all corrective actions in a timely manner* [T-5]
- G-4-1 Document procedures for follow-up on corrective actions. Note if timeframes for compliance are included. [C-6, C-7]
 - G-4-2 Document use of compliance meetings, supervisory review, and follow-ups to ensure facilities implement corrective actions. Note if Hazardous Material/Code

Enforcement Inspectors utilize existing enforcement information to assist in scheduling future inspections. [C-6, C-7]

G-4-3 Review documentation of 25 inspection case files from the last 3 years. Identify the range of time it takes for facilities to comply with the corrective actions. Are there any outstanding issues?

G-5 *Summarize sub-objective results:*

Overall assessment and/or conclusion; Audit issues and/or findings; If information comes to auditor's attention indicating that abuse or illegal acts may have occurred, the Auditor-in Charge will immediately notify the City Auditor and the Supervising Auditor. Audit steps will be extended as necessary and the auditor should determine the extent to which these acts significantly affect the audit results.
(*Audit standards FWS 3A and 3B*).

SUB-OBJECTIVE:

To evaluate internal controls over the reporting and review of Inspection results.

G-6 *Verify that there is supervisory review of Hazardous Materials Inspectors' work and that violation inconsistencies are discussed and appropriate enforcement actions are taken. [Management's Review and Management's Control of Oversight]* [T-2, T-3, T-4, T-6, T-7, T-8]

Document procedures of:

G-6-1 Management's review of Record of Inspections. [C-6, C-7]

G-6-2 Determine what steps are taken to resolve, review, and close cases. Note if timeframes for compliance are included. [C-4, C-5, C-6, C-7]

G-6-3 Review training sessions and agendas for appropriateness, professional issues, guidelines, and for any outstanding issues. [C-5]

G-6-4 Identify the range of time it takes for facilities to comply with the corrective actions. [C-6, C-7]

Determine if there are any outstanding issues by:

G-6-5 Reviewing 100 cases to determine that they were resolved according to the corrective actions and due dates. [C-6, C-7]

G-6-6 Verify that Inspectors apply corrective actions consistently for similar cases. [C-1, C-2, C-5, C-6, C-7]

G-7 *Summarize sub-objective results:*

Overall assessment and/or conclusion;
Audit issues and/or findings; If information comes to auditor's attention indicating that abuse or illegal acts may have occurred, the Auditor-in Charge will immediately notify the City Auditor and the Supervising Auditor. Audit steps will be extended as necessary and the auditor should determine the extent to which these acts significantly affect the audit results. (*Audit standards FWS 3A and 3B*).

SUB-OBJECTIVE:

To evaluate the adequacy of the Inspector salaries.

G-8 *Verify that pay rate is competitive with other city and county agencies within the State of California. Verify that job description and related duties are similar to the City of San Jose. [T-1]*

To determine if City of San Jose's Hazardous Material Inspectors are being paid comparatively with other cities by:

G-8-1 Document pay rates and job duties with the following city and county agencies:
California: Long Beach, Milipitas, Mountain View, Palo Alto, San Diego, Santa Clara, Sunnyvale, West Valley Cities, Los Angeles, Orange, and San Francisco

G-8-2 Determine the turnover rate of the Hazardous Materials Division for the last four years and the causes (burnout, retirement, more money).

G-8-3 Review sick leave and vacation usage.

G-9 *Summarize sub-objective results:*

Overall assessment and/or conclusion;
Audit issues and/or findings; If information comes to auditor's attention indicating that abuse or illegal acts may have occurred, the Auditor-in Charge will immediately notify the City Auditor and the Supervising Auditor. Audit steps will be extended as necessary and the auditor should determine the extent to which these acts significantly affect the audit results. (*Audit standards FWS 3A and 3B*).

SUB-OBJECTIVE:

To evaluate Inspectors performance in complying with inspection performance guidelines and meeting department objectives.

G-10 *Verify that management has established realistic performance goals/objectives for inspectors to finish their assignments.*

[Are 48 yearly inspections sufficient] [T-4]

G-10-1 Review management's performance goals and objectives to determine that they are fair and reasonable.

G-10-2 Review scheduling practices to determine that are adequate. [C-3, C-4]

G-10-3 Document inspector's training programs to determine if Inspector had sufficient and adequate training. [C-1, C-2]

G-10-4 Review Management's information on fire trends, causes of fires, and inspection activities for helping Management making decisions and to permit future assessment of the effectiveness of the Hazardous Materials' program.

G-10-5 Determine the workload level per inspector for the year, per quarter, and per month.

G-10-6 Determine the work schedule of the inspectors.

G-10-7 Determine what work assignments the inspectors participate in outside of Hazardous Material Plan Reviews and Inspections.

G-10-8 Determine the inspection requirements per Federal, State, County, and City of San Jose rules and regulations.

G-11 *Summarize sub-objective results:*

Overall assessment and/or conclusion;

Audit issues and/or findings; If information comes to auditor's attention indicating that abuse or illegal acts may have occurred, the Auditor-in Charge will immediately notify the City Auditor and the Supervising Auditor. Audit steps will be extended as necessary and the auditor should determine the extent to which these acts significantly affect the audit results. (*Audit standards FWS 3A and 3B*).

SUB-OBJECTIVE:

To evaluate the opportunities to improve the effectiveness and efficiency of the program.

G-12 *Evaluate opportunities for improvement of effectiveness and efficiency in the Code Enforcement program. [T-1, T-2, T-3, T-4, T-5, T-6, T-7]*

G-12-1 Review the San Jose City Fire Code and Charter, State Fire Code, and relevant City of San Jose City policies for code enforcement.

G-12-2 Determine if there is coordinated effort between the Arson's group of reporting on 'what caused the fire' to the latest 'Record of Inspection'.

SUB-OBJECTIVE:

Summarize results of objective.

G-13 *Summarize the data that you accumulated and report on any discrepancies.*

- G-13-1 Prepare preliminary Finding Development Sheets as appropriate. Submit all new or revised Finding Development Sheets to City Auditor with APR according to established bi-weekly schedule. Evaluate whether additional audit steps are required to develop the elements of a complete finding. At the next bi-weekly meeting, discuss the preliminary findings, or the lack thereof, with the City Auditor to assess whether to revise, expand or drop subsequent audit objectives and audit steps.
- G-13-2 Prepare interim reports to auditee as necessary. (Audit Standard RS-2.2)
- G-13-3 Complete numbering, labeling, and cross-indexing of workpapers, APR, workpaper index, and other audit documents. (Procedure 5-02)
- G-13-4 In-charge Review of workpapers, APR files, and indexes prepared by others. Respond to reviewer's notes as necessary. (*File at A-12*)
- G-13-5 Schedule Supervising Auditor review of workpapers and APR files. Respond to reviewer's notes as necessary. (*File at A-13*)

Schedule Second Audit Standards Review after final phase of fieldwork.
(*Procedure 5-01, Section IV-3.2*) Respond to reviewer's notes as necessary.
(*File at A-11*).